

Spring Point Enterprise

Kitty Harrison - Technical Writer

June 15, 2001

Dockets Management Branch, HFA-305 FDA
5630 Fishers Ln., Room 1061
Rockville, MD 20852

RE: Docket OOP- 1322 (FDA Labeling Workshop)

Greetings;

My name is Kitty Harrison and I ask that during the workshop planned for August 13 that you consider a mandate for full disclosure of ingredients and their sources on all food labels. Please eliminate "natural ingredients" and "spices" as acceptable ingredient labels.

I am a middle-aged **woman** with multiple food allergies. The foods I'm allergic to include corn, peanuts, pork, potato, turkey, and others. The corn allergy is the most severe and the hardest ingredient to avoid. I must consider any products including "natural ingredients" off-limits, because corn is certainly natural.

To give you an idea of the enormity of the problem of avoiding corn, the following page includes a list of ingredients that could trigger a reaction. I don't know for sure of its accuracy, because I have compiled the list from many sources over many years. I don't expect you to study each ingredient. My intent is to impress upon you how pervasive corn has become in the American diet and how **difficult** it is to identify ingredients that could potentially harm, permanently disable, or kill an allergic person.

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Ingredients that May Contain Corn

- alcohol
- artificial sweetener (many contain dextrose as an anti caking agent)
- artificial Vitamin C
- artificial color (may be suspended using a corn product)
- artificial Vitamin E (a.k.a. tocoopherol)
- ascorbic acid (Vitamin C)
- Aspartame
- baking powder (often contains baking soda and cornstarch)
- bleached flour (corn products are commonly used in the bleaching process)
- bundle-wrapped products per such as Kleenex and toilet paper)
- caramel,-caramel color, caramel flavoring, caramel "anything"
- cereal, cereal filler
- citric acid
- confectioner's sugar (powdered sugar)
- corn alcohol
- corn anything
- corn flour
- corn gluten
- corn meal
- corn oil (**cold pressed - bad news**)
- corn oil (regular - may be okay)
- cornstarch
- corn sweetener
- corn syrup
- corn syrup solids
- **crystalline** fructose
- dextrin
- dextrose (**often on French fries**)
- diglyceride
- **enriched flour**
- envelopes (don't lick the glue that may contain corn)
- ethanol
- excipients
- extract
- flavoring (natural or artificial may contain corn ingredients)
- food starch
- fructose
- glucose
- glycerides (mono glyceride and diglyceride)
- glycerin
- golden syrup
- grain alcohol
- grain vinegar
- grits
- hominy
- hydrolyzed vegetable protein (this contains MSG, too)
- invert sugar
- invert **syrup**
- iodized salt (often contains **dextrose as an anti-caking agent**)
- lactic acid
- lecithin
- **maize**
- malt (if not specified -barley malt is okay.)
- malt extract
- malt syrup
- maltitol
- maltodextrin
- **mannitol**
- **modified food starch**
- monoglyceride
- Monosodium glutamate (MSG)
- natural flavoring (legally, this can be anything)
- powdered sugar (a.k.a. confectioner's sugar)
- Pectin (often contains dextrose as a secondary ingredient, contains glycerin)
- polyoxyethylene stearate
- polysorbate
- popcorn (lots of people overlook this one!)
- salt (dextrose is added to iodized salt)
- sodium lactate
- sodium stearoyl-2-lactylate
- sorbitol
- spices (sometimes spice mixtures are kept from clumping with cornstarch)
- starch of any kind - unless it specifies a safe source
- sucrose
- sugar (can be corn, cane, date or beet derived)
- toilet paper (first and last sheet may contain glue derived from corn)
- **treacle**
- vanilla extract
- vegetable anything (if not specific)
- vegetable broth
- vegetable diglyceride
- vegetable glycerin (considered safe **for most corn allergic, but check with your doctor before using**)
- vegetable gum
- vegetable monoglyceride
- vegetable oil
- vegetable protein
- vegetable shortening
- vegetable starch
- **vinegar**
- Vitamin C & E
- xanthum gum (popular thickener - highly processed, and considered safe for some corn allergic individuals)
- zein (in medicines - especially time release)

As the very long list illustrates, identifying corn ingredients is an overwhelming task.

Food allergies are not well understood, even by allergists. When I tested positive for the corn allergy, the nurse told me it was okay to use corn oil but to avoid xanthum gum. That was the extent of information I received from that allergist's office . It turns out that the nurse may have been wrong on both counts. Cold pressed oils may cause an allergic reaction, and I have recently

read that xanthum gum, derived from corn, may **not** trigger a reaction. Both medical personnel and consumers need help to simply and clearly identify potentially harmful ingredients.

Enjoying a typical fast food meal of a hamburger, fries, salad, and cola is impossible for me. The bread of the bun contains cornstarch. I'm allergic to potatoes, so the fries are out. Even if I could eat potato, the vegetable oil used for the fries may have corn oil in it. The ketchup contains corn syrup, along with mayonnaise, mustard and salad dressing. Pickles contain natural ingredients that I have never identified. Cola also contains corn syrup. Because of my extensive **research**, I know to avoid these foods. Do you think a **14-year-old** stopping at McDonald's on the way home from school would be aware of the dangers?

Fast food is not the only problem. When I was hospitalized last year for an emergency appendectomy, my sister had to bring my food to me because the hospital had so few foods that could clearly be identified as safe. I ordered an egg on the first day and realized after one bite that it was a powdered egg mix, which contained corn. I went hungry while waiting for my sister to arrive with safe food.

To complicate matters even **more**, ~~the~~ medications that could help counter a reaction, such as antihistamines, very often contain cornstarch which is a binder for many prescription and **over-**the-counter medications.

In order to eat and live safely, an allergic person must be able to **identify** every ingredient in a potentially dangerous food. The person must also know the source of the ingredient. Without full disclosure, the person is forced to completely avoid the food or risk a reaction. Please help simplify the task by mandating the following labeling practices: include full disclosure of ingredients; clarify of the source of the ingredient; and eliminate "natural ingredients" and "spices" from food labels.

Sincerely;

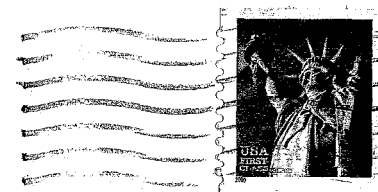
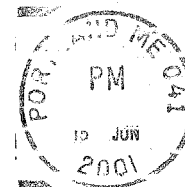


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